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11 *Renee Baker and Terry Lindberg*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES BARKER,
vs.
BAKER, et al.,
Plaintiff,
Defendants.

Case No. 3:19-cv-00161-MMD-CLB

**DEFENDANTS' MOTION FOR EXTENSION
OF TIME TO FILE A DISPOSITIVE
MOTION (FIRST REQUEST)**

Defendants Renee Baker and Terry Lindberg, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Stephen J. Avillo, Deputy Attorney General, hereby request a 21-day extension of time, until June 28, 2021, to file a dispositive motion in this matter. This Motion is based on F.R.C.P. 6(b)(1)(A), LR 1A 6-1, the following Memorandum of Points and Authorities, and all papers and pleadings on file herein.

MEMORANDUM OF POINTS AND AUTHORITIES

Defendants respectfully request a 21-day extension of time, to June 28, 2021, to file a dispositive motion in this matter. This request for an extension has been made necessary by the following.

In the approximately two weeks leading up to the current dispositive motion of June 7, 2021, and the week after the current deadline, undersigned counsel has had two additional dispositive motion deadlines in federal court, a deadline for an early mediation statement, and a deadline for responding to

1 a series of motions in state court. These deadlines are in addition to other routine deadlines throughout
2 counsel's caseload.

3 Good cause supports granting this request. FRCP 6(b)(1) governs extensions of time and
4 provides as follows:

5 When an act may or must be done within a specified time, the court may,
6 for good cause, extend the time: (A) with or without motion or notice if
7 the court acts, or if a request is made, before the original time or its
extension expires; or (B) on motion made after the time has expired if the
party failed to act because of excusable neglect.

8 Counsel submits that his schedule constitutes good cause for the requested extensions, which will not
9 hinder or prejudice Plaintiff's case.

10 Defendants therefore request a 21-day extension of the current deadline, to June 28, 2021, to file a
11 dispositive motion in this matter.

12 DATED this 7th day of June, 2021.

13 AARON D. FORD
14 Attorney General

15 By: /s/ Stephen J. Avillo
16 STEPHEN J. AVILLO, Bar No. 11046
Deputy Attorney General

17 *Attorneys for Defendants*

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19 IT IS SO ORDERED.
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21 Dated: June 8, 2021.
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UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 7th day of June, 2021, I caused to be served, a true and correct copy of the foregoing,

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE A DISPOSITIVE MOTION
(FIRST REQUEST)**, by U.S. District Court CM/ECF Electronic Filing on the following:

James S. Barker, #1133703
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/s/Perla M. Hernandez
An employee of the
Office of the Attorney General